

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**JOSEPH GRIMANDO,**

**Plaintiff,**

**vs.**

**No. 21-CV-00108 KWR/KK**

**UNITED STATES OF AMERICA,**

**Defendant.**

**JOINT MOTION FOR EXTENSION OF TIME  
TO FILE CLOSING DOCUMENTS**

Plaintiff Joseph Grimando and Defendant United States of America, through their respective counsel, hereby seek a 30-day extension of time for the parties to file the closing documents in this matter or until August 5, 2022. The Court originally ordered the parties to submit closing documents by no later than July, 2022. (Doc. 29.) There was a delay in receiving the signed settlement agreement, which resulted in a delay of submitting the claim for payment to the Judgement Fund. The parties respectfully request an extension of time for the parties to submit the closing documents as a result of the delay.

Respectfully Submitted,

Duhigg, Cronin, Spring & Berlin, P.A.

Approved on 7/6/2022

Robert A. Berlin

P.O. Box 527

Albuquerque, NM 87103

Office: (505) 243-3751

Email: [rberlin@duhigglaw.com](mailto:rberlin@duhigglaw.com)

*Attorney for Plaintiff*

ALEXANDER M.M. UBALLEZ  
United States Attorney

/s/ Kimberly N. Bell

KIMBERLY BELL

Assistant U.S. Attorney

P.O. Box 607

Albuquerque, NM 87103

505-224-1458

[Kimberly.Bell@usdoj.gov](mailto:Kimberly.Bell@usdoj.gov)

*Attorney for Defendant*